

2.

In March of 2022, Dominion retained the MITRE Corporation's National Election Security Lab ("MITRE NESL") to perform an independent evaluation of the Plaintiffs' Report.

3.

MITRE NESL is a trusted authority on cybersecurity in the election space, and it provides election industry participants (including state, local, and federal officials) a means to maintain public trust and confidence in our election systems.

4.

MITRE NESL has completed its evaluation and provided a report to Dominion entitled Independent Technical Review: Georgia's ImageCast X Ballot Marking Devices (July 2022) (hereinafter, "MITRE Report").

5.

Dominion has filed the Executive Summary of the MITRE Report on the public docket and now seeks guidance from the Court on Dominion's obligations under the Court's Protective Order [Doc. 477] with respect to the full MITRE Report.

6.

Dominion does not believe releasing the full MITRE Report would contravene the Court's Protective Order in this case and seeks the Court's confirmation that it may release that full report to its current customers.

Respectfully submitted: September 19, 2022.

/s/ J. Matthew Maguire, Jr.
J. Matthew Maguire, Jr.
Georgia Bar No. 372670
mmaguire@pcwlawfirm.com
Robert J. Kozloski, III
Georgia Bar No. 548519
rkozloski@pcwlawfirm.com

PARKS, CHESIN & WALBERT, P.C.

75 14th Street, N.E., 26th Floor

Atlanta, Georgia 30309

T: (404) 873-8000

F: (404) 873-8050

Counsel for Non-Party U.S. Dominion, Inc.

**CERTIFICATE OF COMPLIANCE
AND SERVICE**

I hereby certify that the foregoing as prepared using Times New Roman font, 14-point type, which is one of the font and point selections approved by the Court in L.R. 5.1(B). I further certify that I filed the within and foregoing *Non-Party U.S. Dominion, Inc.'s Motion for Leave to File Under Seal* using the CM/ECF system, which will automatically send notification of such filing to all counsel of record.

Respectfully submitted: September 19, 2022.

/s/ J. Matthew Maguire, Jr.
J. Matthew Maguire, Jr.
Georgia Bar No. 372670
mmaguire@pcwlawfirm.com